

EXHIBIT 5

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

Case

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

10 | _____ /

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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VIDEOTAPED DEPOSITION OF BENJAMIN INGRAM

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WEDNESDAY, AUGUST 16, 2017

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Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2678952

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1 Trade Secret 25 items. It has -- 10:52:22
2 (Reporter seeks clarification.)
3 A. -- "Go/V2 Sensor Requirements" in the title. 10:52:33
4 And that's -- that had a list of use cases we expected 10:52:38
5 to drive the design. 10:52:39
6 Q. And, generally speaking, what were the 10:52:42
7 driving use cases? 10:52:46
8 A. It's a hard thing to talk about in general. 10:52:48
9 I think there are 70 or something cases in that 10:52:52
10 document. These are things that, through the years of 10:52:57
11 driving and the millions of miles in driving that 10:53:00
12 we've done, we have come to understand are likely to 10:53:04
13 drive a LiDAR design. 10:53:07
14 Q. And you referred, I think, to the documents 10:53:09
15 that appear in alleged Trade Secret 25 in this case, 10:53:13
16 those documents contain the driving use cases? 10:53:17
17 A. That's correct. 10:53:20
18 Q. We'll look at those later on. 10:53:22
19 Number 3 here says, [REDACTED] [REDACTED]
[REDACTED] 10:53:26
21 Do you see that? 10:53:27
22 A. I do. 10:53:28
23 Q. What does that refer to? 10:53:31
24 A. That refers to Christian Lauterbach, who is 10:53:32
25 C. Lauterbach in this e-mail, had built a simulator 10:53:36